REMARKS

Reconsideration of the patent application in view of the preceding amendments and the following remarks is respectfully requested.

Rejection of the Claims Under 35 U.S.C. § 102

In the office action dated 9/18/2003, the Examiner rejected claims 4 to 10 under 35 U.S.C. § 102. The Examiner stated that the claimed invention was anticipated by U.S. patent application publication US 2002/0032696 filed by <u>Takiguchi</u>, et al. (hereinafter referred to as the <u>Takiguchi</u>, et al. reference). The Applicants respectfully traverse.

The <u>Takiguchi</u>, et al. reference discloses an intuitive hierarchical timeseries data display method and system. In the system of the <u>Takiguchi</u>, et al. reference a novel method of displaying images is presented. As set forth with reference to **Figures 3**, 8 and 10, the system of the <u>Takiguchi</u>, et al. reference displays images in a manner related to time information.

However, the <u>Takiguchi, et al.</u> reference does not disclose a system wherein a set of images are acquired during a single session and all the images acquired during that session are marked as being related as required by <u>claim 4</u> of the present invention. Specifically, claim 4 requires "acquiring a first set of digital image files into said computer system during a first single session" and "marking said first set of digital

Attny Docket: APLE.P0018 PTO Serial Number: 10/042,944 image files acquired into said computer system during said first single session as a set of related image files".

This seemingly trivial pair of steps allows a user to identify a set of related images in a manner that is intuitive to people since it emulates an existing interface. Specifically, people are intimately familiar with the concept of taking a set of pictures on a film camera using a single roll of film. Later, that film roll is developed such that all the pictures on that roll are received at the same time. The person naturally associates the pictures from that single film roll. The system of the present invention emulates that familiar user interface. Specifically, when a user employs a system incorporating the teachings of the present invention then all the image files acquired during a single session (such as a download from a digital camera) will be marked as being related. This marking allows the images to be displayed together or otherwise handled as a related set of images.

The <u>Takiguchi</u>, et al. reference does not disclose nor teach toward the system of the present invention wherein a set of images are acquired during a single session are marked as being related. Thus, claim 4 of the present invention is neither anticipated by nor obvious in view of the <u>Takiguchi</u>, et al. reference. The remaining claims 5 to 10 are dependent on independent claim 4 and are thus likewise allowable.

Attny Docket: APLE.P0018 PTO Serial Number: 10/042,944

CONCLUSION

In view of the foregoing, it is submitted that the claims are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

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